

## **REMARKS**

Claims 1-38 are pending in the present application. Claims 1-38 have been rejected. No claims have been allowed. Claims 1, 23 and 33 have been amended solely to clarify that which is being claimed. No claims have been canceled or added herein.

The Final Office Action mailed January 25, 2008 has been carefully considered by Applicants. Reconsideration in view of the foregoing claim amendments and following remarks is respectfully requested.

### **I. Claim Rejections under 35 U.S.C. § 102**

Claims 1-13, 17-22 and 33-38 stand rejected under 35 U.S.C. § 102(b) as being anticipated by European Patent Publication No. EP 0 738 991 A2, to the applicant Barcrest Limited, having representative Quest et al. (“Barcrest”). In particular, the Final Office Action states with respect to Barcrest: “The master gaming controller and the dedicated processing unit may be the same unit.” Applicants respectfully traverse.

In so traversing, Applicants incorporate by reference all previous remarks from Applicants’ prior Response of November 13, 2007. In particular, in order to anticipate a claim, a given reference must teach every material element of that claim. Each of pending independent claims 1, 33 and 38 includes, *inter alia*:

- a master gaming controller adapted to control game play and authorize payouts,
- one or more major components having a first universal communication interface,
- the one or more major components adapted to be removable from the gaming machine,
- a universal gaming engine having at least one dedicated processing unit, and
- the universal gaming engine also having a second universal communication interface.

Applicants respectfully submit that Barcrest does not include all of the foregoing elements, and at the very least does not include the recited master gaming controller along with a separate dedicated processing unit for a universal gaming engine, as claimed.

Although the Office Action appears to point to relevant portions of Barcrest as allegedly teaching every element of claim 1, Applicants note that many of the claim elements have been lumped together for this purpose, that no specific correlations of claim elements to items in Barcrest have been made, and that some items of Barcrest are apparently being used to meet multiple claim elements, which claim elements are clearly separate items.

Applicants again noted that most of the pending claims require: 1) a primary processor adapted to control game play and authorize payouts (e.g., a master gaming controller), and a 2) a *separate dedicated processing unit* within a 3) universal gaming engine adapted to control peripheral devices on a 4) removable and interchangeable major component, where the removable major component and universal gaming engine both have 5) universal communication interfaces. While Barcrest may teach the first of these five elements, Applicants respectfully submit that Barcrest does not teach all of the remaining elements enumerated here.

In contrast, Barcrest merely depicts a modular display and control panel, with *a single processor 23* being responsible for all activities in its gaming machine. This single processor cannot simultaneously be a primary processor adapted to control game play and a separate dedicated processing unit within a universal gaming engine. In fact, Barcrest does not teach or suggest anything that remotely resembles a universal gaming engine as described and claimed in the present application. In addition, the pending specification as filed explains in numerous locations that a “major component” as claimed can be a top box, a main cabinet, or other similar component or portion of a gaming machine. Applicants respectfully submit that a removable display or removable control panel does not qualify as such a “major component” as described and claimed. Still further, the pending claims require first and second universal communication interfaces for the major component and universal gaming engine. Nothing in Barcrest appears to meet these additional claim elements.

Applicants further point out that the title of the present application and a substantial portion of the description and figures all depict a “Universal Gaming Engine” that is adapted to control a substantial portion of a collection of peripheral devices on a removable component, with such a universal gaming engine *being separate from* the master gaming controller. One specific example of such a “universal gaming engine” in the specification as filed is provided with respect to FIG. 3 and the associated written description. Here, the removable major component is a top box, and the universal gaming engine comprises a separate CPU that controls seven different peripheral devices within the top box. Nothing in Barcrest remotely shows or describes such an item and set of relationships.

Applicants also note that the terms “top box” and “main cabinet” are not only well known in the gaming machine arts, but that these terms are described at length and with numerous examples throughout the specification as filed. Gaming machine top boxes are described and illustrated at length at, for example, paragraphs [0011]-[0014] and [0036]-[0056], as well as in Figures 1 through 4 of the specification as filed. As such, Applicants are at a loss as to why the Final Office Action suggests that such an item may not be defined in light of the specification and that which is known by those skilled in the art.

As noted previously, no details have been provided in the first Office Action, and now none in the Final Office Action, for the rejections of any of claims 33-38. As such, no *prima facie* basis for rejection has been made for any of these claims in any event. These claims are not identical to other claims. For example, claim 38 recites a first game theme and a change to a second game, which elements are not present in any other claim. Applicants respectfully traverse the rejections of claims 33-38 because no *prima facie* case for rejection has been made, and submit that the Final Rejections of claims 33-38 are deficient on their face. Withdrawal of the rejections of these claims is again specifically requested.

Applicants again note that numerous dependent claims have also been improperly rejected on several grounds. For example, dependent claim 4 recites the added limitation, “wherein said removable and interchangeable major component and said universal gaming engine are adapted to detach from said gaming machine as a combined unit.” Applicants respectfully submit that Barcrest neither teaches nor suggests a discrete universal gaming engine having a dedicated processing unit and universal communication interface, much less such a universal gaming engine that also detaches from the gaming machine along with a removable major component.

In addition, dependent claim 6 recites the added limitation, “wherein said removable and interchangeable major component comprises a top box.” Dependent claim 34 similarly recites a removable and interchangeable top box. Although the Office Action points to Barcrest at column 6, lines 5-32 for this element, nothing in this passage appears to disclose or describe a removable and interchangeable top box. In fact, nothing in Barcrest as a whole teaches or suggests a removable and interchangeable top box. The term “top box” is a well understood term of art within the gaming industry, and refers to the separate smaller box type unit that is situated atop the main cabinet on many wager based (e.g., “fruit type”) gaming machines. Such a “top box” is well understood to be more than a simple display or control panel, which look to be the only removable elements of Barcrest. In fact, as set forth in the present specification as filed, a top box can contain a variety of multiple and disparate peripheral devices within and about it. Much of the focus of the present invention is in providing a way for top boxes and main cabinets to be interchangeable, as such items have traditionally been customized for each other within the gaming manufacturing industry. Applicants respectfully submit that there is adequate support in the specification for use of the term “top box,” and that Barcrest does not teach such an item that is removable and interchangeable.

Further, dependent claim 8 recites the added limitation, “wherein said removable and interchangeable major component comprises a main cabinet.” Dependent claim 36 similarly recites a removable and interchangeable main cabinet. Applicants respectfully submit that Barcrest simply does not disclose or suggest anything that remotely resembles a gaming machine having a removable and interchangeable main cabinet. Such a gaming machine having such a removable and interchangeable main cabinet is supported by the specification as filed at, for example FIG. 5B and its supporting written description. The rejections of other dependent claims are similarly traversed, inasmuch as such claims also require a removable top box and/or main cabinet. Such further claims include at least claims 7, 9, 35 and 37.

Still further, dependent claims 18-21 all recite various limitations with respect to the recited first and second universal communication interfaces. For example, claim 20 requires that the second universal communication interface comprise a standardized layout of physical connections that is consistent across a plurality of other universal gaming engines, wherein said standardized layout of physical connections comprises a grid of ported connections. Nothing in Barcrest teaches or suggests such a standardized grid of ported connections.

In addition, Applicants strongly disagree with the assertion in the Final Office Action, “The master gaming controller and the dedicated processing unit may be the same unit.” Applicants note that these are separate and distinct claim elements, and under the principles of claim interpretation are not to be interpreted as potentially being the same exact thing.

For at least the foregoing reasons, Applicants respectfully submit that Barcrest does not anticipate any of independent claims 1, 22, 33 and 38. Because they all depend from one of these independent claims, Barcrest inherently does not anticipate any of dependent claims 2-13, 17-21 or 34-37 either, for at least the same reasons. Withdrawal of the § 102(b) rejections with respect to Barcrest is thus respectfully requested.

## **II. Claim Amendments**

Nevertheless, in the interests of furthering prosecution, Applicants have amended independent claims 1, 23 and 33 solely to clarify this point, and respectfully submit that this clarifying amendment does not reduce the scope of any claims thereby. Applicants respectfully submit that the pending claims as they now read clearly are not anticipated by Barcrest, and request that the withdrawal of the § 102(b) rejections with respect to Barcrest for at least this additional reason.

## **III. Claim Rejections under 35 U.S.C. § 103**

Claims 14-16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Barcrest alone. Further, claims 23-32 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Barcrest in view of U.S. Patent Publication No. 2002/0138594 to Rowe (“Rowe”). Applicants respectfully traverse these pending § 103(a) rejections.

Each of claims 14-16 depend from independent claim 1, while each of claims 24-32 depend from independent claim 23. Independent claim 23 recites a system that includes the same gaming machine as recited in claim 1. Rowe has not been used to cure any of the noted deficiencies above with respect to the rejection of claim 1. Accordingly, Applicants respectfully submit that neither Barcrest nor the combination of Barcrest and Rowe renders any of claims 14-16 or 23-32 as obvious, for at least the same reasons as those given for claim 1 above. Withdrawal of the § 103(a) rejections of claims 14-16 and 23-32 is thus respectfully requested.

## **CONCLUSION**

Applicants respectfully submit that all claims are in proper form and condition for patentability, and thus request a Notification of Allowance to that effect. Consideration for an RCE is being submitted herewith. Should such consideration be inadvertently omitted, or should any other fee be required for any reason related to this document or application, however, then the Commissioner is hereby authorized to charge said fee to Deposit Account No. 50-0388, referencing Docket No. IGT1P104. The Examiner is respectfully requested to contact the undersigned attorney at the telephone number below with any questions or concerns relating to this document or application.

Respectfully submitted,  
BEYER LAW GROUP LLP

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